

EXHIBIT 4

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION**

In re

Case No. 05-14659 AJ

THE LEGACY ESTATE GROUP, LLC, a California limited liability company, formerly doing business as FREEMARK ABBEY WINERY, BYRON VINEYARD & WINERY, AND ARROWOOD VINEYARD & WINERY.

Debtor.

Adv. No. 06-01173

Chapter 11

**LAMINAR DIRECT CAPITAL L.P.'S
RESPONSE TO MOTION TO CERTIFY
PROCEEDING TO DISTRICT COURT
FOR TRIAL BY JURY PURSUANT TO
BANKRUPTCY LOCAL RULE 9015-2**

Date: February 23, 2007

Time: 9:00 a.m.

Place: 99 S. "E" Street
Santa Rosa, CA 95404

**OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF THE
LEGACY ESTATE GROUP, LLC,**

Plaintiff,

V.

JOHN M. BRYAN, JOHN M. AND
FLORENCE E. BRYAN TRUST, J.M.
BRYAN FAMILY TRUST, KULWINDER
SIDHU, DEVINDER SIDHU, PACIFIC
PARAGON INVESTMENT FUND LTD, a
British Columbia company, HARRY CHEW,
and AIC CAPITAL PARTNERS, LLC, a
California limited liability company,

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2 Defendants.
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5 JOHN M. BRYAN, JOHN M. AND
6 FLORENCE BRYAN TRUST, J.M. BRYAN
7 FAMILY TRUST,
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9 Defendants/Cross-Claimants,
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11 v.
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13 KULWINDER SIDHU, DEVINDER
14 SIDHU, PACIFIC PARAGON
15 INVESTMENT FUND, LTD, a British
16 Columbia company, HARRY CHEW, AIC
17 CAPITAL PARTNERS, LLC, a California
18 limited liability company, and LAMINAR
19 DIRECT CAPITAL, L.P., a Texas limited
20 partnership,
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22 Defendants/Cross-Defendants.
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RESPONSE

Laminar Direct Capital, L.P., a Cross-Defendant herein ("Laminar"), hereby submits its Response to the "Motion to Certify Proceeding to District Court for Trial by Jury Pursuant to Bankruptcy Local Rule 9015-2" filed by Defendants and Cross-Claimants John M. Bryan, John M. and Florence E. Bryan Trust and J.M. Bryan Family Trust.

Laminar reserves its right to a jury trial in this adversary proceeding. The Cross-Claim against Laminar and the other Cross-Defendants, however, represents only a small portion of this adversary proceeding. Therefore, Laminar respectfully submits that certification of this adversary proceeding should not occur unless and until a jury trial on the Cross-Claim or any other portion of the adversary proceeding is to take place. Administering this adversary proceeding as a whole in this Court until such time will facilitate the expeditious resolution of this adversary proceeding, and will reduce the expense associated with litigating this matter.

Respectfully Submitted,

KLEE, TUCHIN, BOGDANOFF & STERN LLP

DATED: February 22, 2007

/s/ Courtney E. Pozmantier

COURTNEY E. POZMANTIER

Counsel for Cross-Defendant Laminar Direct Capital, L.P.